

**UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NETLIST, INC.,

Plaintiff,

VS.

MICRON TECHNOLOGY, INC.,
MICRON SEMICONDUCTOR
PRODUCTS, INC., AND MICRON
TECHNOLOGY TEXAS LLC,

Defendants.

Case No. 2:22-CV-203-JRG

JURY TRIAL DEMANDED

**DECLARATION OF JASON G. SHEASBY IN SUPPORT OF NETLIST'S
OPENING CLAIM CONSTRUCTION BRIEF**

I, Jason G. Sheasby, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. (“Netlist”) in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Netlist’s Opening Claim Construction Brief. I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 1** is true and correct copy of U.S. Patent No. 8,787,060.

3. Attached as **Exhibit 2** is a true and correct copy of U.S. Patent No. 9,318,160.

4. Attached as **Exhibit 3** is a true and correct copy of U.S. Patent No. 10,860,506.

5. Attached as **Exhibit 4** is a true and correct copy of U.S. Patent No. 10,949,339.

6. Attached as **Exhibit 5** is a true and correct copy of U.S. Patent No. 11,016,918.

7. Attached as **Exhibit 6** is a true and correct copy of U.S. Patent No. 11,232,054.

8. Attached as **Exhibit 7** is a true and correct copy of the Claim Construction Order from *Netlist Inc. v. Samsung Elecs. Co., Ltd.*, Case No. 2:21-CV-00463-JRG, Dkt. 114 (Dec. 14, 2022).

9. Attached as **Exhibit 8** is a true and correct copy of the Declaration of Harold S. Stone, Ph.D., in Support of Defendants’ Claim Construction Positions.

10. Attached as **Exhibit 9** is a true and correct copy of email correspondence from Micron counsel to Netlist counsel on April 27, 2023.

11. Attached as **Exhibit 10** is a true and correct copy of a document titled, “1.2V 64Gb 341GB/s HBM2 Stacked DRAM with Spiral Point-to-Point TSV Structure and Improved Bank Group Data Control.”

12. Attached as **Exhibit 11** is a true and correct excerpted copy of the Petition for

Inter Partes Review of U.S. Patent No. 9,318,160 in IPR2023-00883.

13. Attached as **Exhibit 12** is a true and correct copy of the Patent Owner's Response in IPR2022-00236.

14. Attached as **Exhibit 13** is a true and correct copy of a document titled, "External Memory Interface Handbook Volume 2: Design Guidelines."

15. Attached as **Exhibit 14** is a true and correct copy of the Amendment after Notice of Allowance dated October 16, 2020.

16. Attached as **Exhibit 15** is a true and correct copy of a document titled "Power Supply Reference Guide for Xilinx FPGAs."

17. Attached as **Exhibit 16** is a true and correct excerpted copy of the Markman Hearing transcript from *Netlist Inc. v. Samsung Elecs. Co., Ltd.*, Case No. 2:21-CV-00463-JRG.

18. Attached as **Exhibit 17** is a true and correct copy of the deposition transcript of Andrew Wolfe, Ph.D in IPR2022-00996, dated March 16, 2023.

19. Attached as **Exhibit 18** is a true and correct excerpted copy of the Chambers Dictionary of Science and Technology, with a copyright date of 2007.

20. Attached as **Exhibit 19** is a true and correct excerpted copy of the Comprehensive Dictionary of Electrical Engineering, with a copyright date of 2005.

21. Attached as **Exhibit 20** is a true and correct excerpted copy of A Dictionary of Computing, with a copyright date of 2008.

22. Attached as **Exhibit 21** is a true and correct excerpted copy of the Dictionary of Science and Technology, with a copyright date of 2007.

23. Attached as **Exhibit 22** is a true and correct copy of U.S. Patent No. 8,020,022 ("Tokuhiko").

24. Attached as **Exhibit 23** is a true and correct excerpted copy of the trial

transcript from *Netlist Inc. v. Samsung Elecs. Co., Ltd.*, Case No. 2:21-CV-00463-JRG.

Executed on June 7, 2023, in Los Angeles, California.

By /s/ Jason G. Sheasby

Jason G. Sheasby